

*The Estate of Cindy Lou Hill, by and through its personal representative, Joseph A.
Grube; and Cynthia Metsker, individually vs. Naphcare, Inc., et al.*

No. 2:20-cv-00410-MKD

Exhibit to Reply Declaration of Edwin S. Budge

Exhibit F

Edwin Budge

From: John Justice <jjustice@lldkb.com>
Sent: Tuesday, January 4, 2022 1:02 PM
To: Hank Balson; Erin Ehlert; Ketia B. Wick; Shannon L. Clark; Alisha P. Chand; Kenya C. Owens; Edwin Budge; Sally Hartmann
Cc: Tod Monroe; Lisa Gates; tam truong
Subject: RE: E-Service: Hill v. NaphCare: Spokane County's Supplemental Discovery

Counsel,

In the course of preparing the County's response to plaintiffs' spoliation motion, my office was creating a list of the Jail videos that were produced in discovery. There is a seven hour and twenty six minute video that depicts the hallway outside of 2W27 on 8/25/18 from approximately 9:30 a.m. until 5 p.m.. It is in folder "share_309851" and is video 1-2W Front Door-C32_20180825T160900.000Z_0. I believed that all Jail video had already been produced, but it appears that this segment was somehow not included and that oversight was not discovered until this week. I don't know how this happened, but I am in the process of uploading all the videos my office has and will forward the dropbox link as soon as the uploading process is complete.

Sincerely,

John E. Justice

Law, Lyman, Daniel, Kamerrer &
Bogdanovich, P.S.
P.O. Box 11880, Olympia, WA 98508
Direct Line: (360) 764-7727
e-mail: jjustice@lldkb.com
website: www.lldkb.com

From: John Justice
Sent: Friday, December 17, 2021 11:54 AM
To: Hank Balson <hank@budgeandheipt.com>; Erin Ehlert <erine@favros.com>; Ketia B. Wick <ketia@favros.com>; Shannon L. Clark <shannon@favros.com>; Alisha P. Chand <alisha@favros.com>; Kenya C. Owens <kenya@favros.com>; Edwin Budge <ed@budgeandheipt.com>; Sally Hartmann <sally@budgeandheipt.com>
Cc: Tod Monroe <tmonroe@lldkb.com>; Lisa Gates <lisa@lldkb.com>; tam truong <tam@lldkb.com>
Subject: E-Service: Hill v. NaphCare: Spokane County's Expert Witness Disclosure

Please see attached.

Thanks,

John E. Justice

Law, Lyman, Daniel, Kamerrer &
Bogdanovich, P.S.

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website: www.lldkb.com